

respectfully disagree with the rejection for at least the reasons given in Applicants' previously submitted amendment dated January 28, 2002.

The Applicants understand that the rejection is based on obviousness, not anticipation, over Ho. However, Applicants' point is that it would not have been obvious to modify Ho because the cited prior art including Fabbio does not teach or suggest improving the value of a fax machine as a standalone, document transmission device, by providing the fax machine with the capability recited in Applicants' claims, namely that of receiving a fax telephone number and an e-mail address of the same recipient and transmitting a converted document to both the facsimile telephone number and to the e-mail address, in response to the same instance of an actuator of the fax machine being activated by the user. That is because, now referring to Fabbio, the prior art is directed to a software system that is to be deployed on a group of network computers, to allow files to be sent to a variety of different destinations including a fax machine, an e-mail address, and a printer. Thus, the thrust of Fabbio is to improve usage of general purpose computer systems that are part of a network, by way of the application software that has the capability of sending a file to a variety of destinations. However, this is not the type of teaching that would motivate one of ordinary skill in the art of standalone fax machines to modify the fax machine with the capability recited in Applicants' claims. Indeed, it can be seen that Fabbio and Ho, where Ho does appear to be related to fax machines, have been placed in different classes, both under the International and the U. S. patent classification system. Therefore, for all of these reasons, Applicants submit that it would not have been obvious to one of ordinary skill in the art to modify the teachings of Ho which may also involve a standalone fax

machine, with those of Fabbio that are directed to a software configuration designed for networked computer systems, to arrive at Applicants' claimed capabilities.

In sum, a good faith attempt has been made to explain why Applicants believe the claims properly delineate Applicants' invention in view of the prior art. It is believed that the claims are in condition for allowance such that a Notice of Allowance referring to claims 19-36 is earnestly requested to issue at the earliest possible date.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: July 23, 2002



Farzad E. Amini, Reg. No. 42,261

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, California 90025  
(310) 207-3800

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231 on July 23, 2002.

  
Jean Svoboda